

REMARKS**Introduction**

The present Amendment is in response to the Examiner's Office Action mailed March 29, 2004. Claims 1-4, 7-8, 11, 13-14, 17, 24, and 26-31 are amended. Claims 1-33 are now pending in view of the above amendments.

Reconsideration of the application is respectfully requested in view of the above amendments to the claims and the following remarks. For the Examiner's convenience and reference, Applicant's remarks are presented in the order in which the corresponding issues were raised in the Office Action.

Rejections Under 35 U.S.C. § 102

The Office Action rejected claims 1-17, 19, and 21-33 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent 6,208,659 (Govindarajan). Anticipation requires that "[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The following discussion illustrates that Govindarajan does not satisfy the requirements of *Verdegaal*.

Govindarajan relates to a system that allows subscribers to have web business cards that are accessible by other individuals over the Internet. Govindarajan teaches that the web card is in effect a web card page. Specifically, Govindarajan teaches that "the present invention implements a data processing system and methodology for allowing individuals to have personal communication services pages, referred to as web card pages . . ." See col. 4, lines 24-26.

Govindarajan, however, does not teach a method for controlling how text and links of the web card page will be presented to a user over a telephone system. Figure 6A and 6B, which were used to reject claims 1, 24, and 31, describe a method for an owner to alter their web card page. Element 610, for example, illustrates an owner that is adding icons to his or her web card page. Figure 20, also used to reject claims 1, 24, and 31, illustrates "three types of web card pages using the web card's page development methodology set forth in Fig. 6." *See* col. 12, lines 1-3.

Figures 6 and 20 illustrate that a web card can be designed by an owner. An owner can add icons and or other types of status. When someone wants to contact the owner, however, the web card simply provides the data and does not present text or links to a user over a telephone system.

For example, Govindarajan teaches that when an icon is selected, each of the communication devices with which the owner of the web card page is associated and the status of the communication devices is provided therein. *See* col. 12, lines 39-42. Then the user may "access one of those communication devices to communicate with the owner of the web card page in an appropriate manner. The user may access one of those communication devices using traditional techniques, whereby a phone number is dialed to place a call, a page, or a deliver a facsimile." *See* col. 12, lines 43-48. In other words, the web page card provides information, but a user must use a telephone to actually make contact with the owner.

The web card page can also take into account role and status for an owner. Figure 20 illustrates the web card page of a particular owner with three roles: business web card page, Little League Coach web card page, and a personal web card page. *See* col. 12, lines 4-27. These roles enable people desiring to contact the owner to do so as suggested by the web card

pages. It appears, for example, that one of the web card owner's little league players would use the information provided on the Little League Coach web card page.

In other words, Govindarajan teaches systems and methods for allowing owners to have web card pages. Figures 6 and 20 teach that a user can customize the web card pages, for example, by role or status. Govindarajan does not teach a map to present selected regions of the web card page to a user over a telephone system. In other words, the web card page taught by Govindarajan is not mapped to a user-defined map that can be accessed over a telephone system.

In contrast, Claim 1 is a method for enabling a user to map an Internet document to control how text and links of the Internet document will be presented to the user over the telephone system. Claim 1 requires creating a user-defined map that controls which portions of the Internet document are presented to the user over a telephone system without modifying of the Internet document. The user-defined map is **separate and distinct** from the corresponding Internet document being mapped. Further, the user-defined map is accessible over a telephone system.

In sum, Govindarajan teaches a web card page that is modified by an owner. *See, e.g.,* Figure 6 and 20. Claim 1 creates a user-defined map of a separate Internet document. The user-defined map controls which portions of the Internet document are presented to the user over a telephone system without modifying of the Internet document. As discussed above, an owner is clearly modifying the web card page by, as discussed in Figure 6 of Govindarajan, adding icons and the like. Further, Govindarajan does not describe a separate user-defined map of the web card page that controls which portions of the web card page are presented to a user over a telephone system.

For at least these reasons, claim 1 is believed to overcome the art of record and is believed to be in condition for allowance. The independent claims 24 and 31 have been similarly amended and are therefore also believed to be in condition for allowance. Claims 2-16, 19, 21-23, 25-30, and 32-33 depend from one of the claims 1, 24, and 31 and believed to be in condition for allowance for at least this reason.

Claim 17 as amended also requires that the user-defined map control which regions of the Internet document are presented to the user without modifying the Internet document. Claim 17 further requires prompting the user over the telephone system to select a category of the user-defined map; retrieving at least a particular region of the Internet document based on the selected category; and comparing a particular region of the Internet document to the user-defined map.

As discussed above, Govindarajan enables an owner to access their web page and make changes such as adding icons. However, Govindarajan does not teach a user-defined map that controls which regions of the Internet document are presented to the user over the telephone system as previously described. Govindarajan further does not prompt the user over the telephone system to select a category of the user-defined map, nor does Govindarajan retrieve a particular region of the Internet document based on the category and compare the particular region to the user-defined map.

For at least these reasons, claim 17 is believed to overcome Govindarajan and is in condition for allowance. Claims 19, and 21-23 depend from claim 17 and overcome the cited art for at least this reason.

Claim Rejections under 35 U.S.C. § 103

Claim 18 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Govindarajan in view of U.S. Patent No. 5,915,001 (Uppaluru). Claim 20 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Govindarajan in view of U.S. Patent No. 6,459,774 (Ball).

As discussed above, Govindarajan teaches web card pages that can be customized, by adding icons, for example. *See also* Figures 6, 20. An owner can add different roles and status to the web card page as discussed above with respect to Figure 20 of Govindarajan. The above discussion also illustrates that Govindarajan does not teach a separate user-defined map that controls how regions of the Internet document is presented to a user over a telephone system.

Uppaluru is cited as teaching text-to speech for generating speech from web page links and text. Ball is cited as teaching voice extensible Markup Language aiding users to access web documents using audio terminals. As a result, neither Uppaluru or Ball teach a user-defined map that controls how regions of the Internet document are presented to a user over a telephone system.

As a result, the combination of Govindarajan and Uppaluru or Govindarajan and Ball do not teach or suggest either claim 18 or claim 20. For at least these reasons, claims 18 and 20 are believed to overcome the art of record and are in condition for allowance.

Conclusion

Applicant respectfully notes that the discussion herein should not be construed to constitute an exhaustive enumeration of the distinctions between the claims of the present application and the references cited by the Examiner. Instead, such distinctions are presented solely by way of example. Consistent with the foregoing, the discussion herein is not intended,

and should not be construed, to prejudice or foreclose future consideration, by the Applicant, of additional or alternative distinctions between the claims of the present application and the references cited by the Examiner.

Applicant notes further that the arguments and/or amendments presented herein have been made merely to clarify the claimed invention from elements purported by the Examiner to be disclosed by the cited prior art references. Such arguments and/or amendments should not, however, be construed as an acquiescence on the part of the Applicant as to the purported teachings or prior art status of any of the cited references, nor as to any characterization of the cited references advanced by the Examiner. Accordingly, Applicant reserves the right to challenge the purported teaching and prior art status of any and all of the cited references at any appropriate time.

In light of the arguments set forth above, Applicants earnestly believe that they are entitled to a letters patent, and respectfully solicit the Examiner to expedite prosecution of this patent application to issuance. Should the Examiner have any questions, the Examiner is encouraged to telephone the undersigned.

Respectfully submitted,

Date: August 30, 2004

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